

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,**

Plaintiff,

Civil Action No.

2:14-cv-14-13710

Hon. SEAN F. COX

v.

**R.G. & G.R. HARRIS FUNERAL  
HOMES, INC.,**

Defendant.

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**DEFENDANT R.G. & G.R. HARRIS FUNERAL HOMES,**  
**INC'S RESPONSE TO MOTION TO INTERVENE**

NOW COMES the Defendant, R.G. & G.R. HARRIS FUNERAL HOMES, INC, by and through its attorneys, ALLIANCE DEFENDING FREEDOM, and JOEL J. KIRKPATRICK, P.C., its Response to the Motion to Intervene states:

1. Admit that this action was initiated by the EEOC, denied as to the rest of the statement.
2. Admitted.
3. Admitted.
4. Admitted.
5. The statement speaks for itself.
6. The statement speaks for itself.

7. The statement speaks for itself.
8. The statement speaks for itself.
9. While this matter was pending before the United States Court of Appeals to the Sixth Circuit, Aimee A. Stephens filed a motion to intervene. Defendant filed a motion in opposition to Aimee Stephens motion to intervene. The Sixth Circuit Court of Appeals granted Aimee Stephens leave to intervene.

Now that the case has been remanded to the District Court, Plaintiff EEOC and Defendant Harris Funeral Homes—the parties of record—have conducted extensive settlement negotiations. Defendant and Plaintiff have reached agreement in principle on case resolution. Defendant has in good faith engaged in settlement discussions with proposed plaintiff-intervenor, but with no success.

#### **RESPONSE TO PRAYER FOR RELIEF**

Defendant continues to pursue serious settlement or resolution with proposed plaintiff-intervenor. Defendant requests the court use its sound discretion in considering the motion to intervene.

**JOEL J. KIRKPATRICK, P.C.**

/s/ Joel J. Kirkpatrick  
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**ALLIANCE DEFENDING  
FREEDOM**

/s/ John J. Bursch  
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**CERTIFICATE OF SERVICE**

I certify that on September 14, 2020, a copy of the above *Response* was filed electronically via the ECF filing system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Joel J. Kirkpatrick

**JOEL J. KIRKPATRICK**